

South Carolina First Steps to School Readiness

Financial Statements

*For the Year Ended June 30, 2019*





SOUTH CAROLINA OFFICE OF THE STATE AUDITOR  
1401 Main Street, Suite 1200 • Columbia, SC 29201

September 25, 2019

Members of the Board of Trustees  
South Carolina First Steps to School Readiness  
Columbia, South Carolina

This report on the audit of the financial statements of the South Carolina First Steps to School Readiness for the year ended June 30, 2019, was issued by Greene Finney, LLP, Certified Public Accountants, under contract with the South Carolina Office of the State Auditor.

If you have any questions regarding this report, please let us know.

Respectfully submitted,

George L. Kennedy, III, CPA  
State Auditor

GLKIII/cmw

## Table of Contents

	<u>Page</u>
Independent Auditor's Report .....	1-2
Management's Discussion and Analysis .....	3-7
Basic Financial Statements:	
Statement of Net Position .....	8
Statement of Activities .....	9
Balance Sheet-Governmental Fund.....	10
Reconciliation of the Balance Sheet of the Governmental Fund to the Statement of Net Position .....	11
Statement of Revenues, Expenditures, and Change in Fund Balance- Governmental Fund .....	12
Reconciliation of the Statement of Revenues, Expenditures, and Change In Fund Balance of the Governmental Fund to the Statement of Activities .....	13
Notes to the Financial Statements .....	14-38
Required Supplementary Information – Budgetary Comparison Schedules.....	39-40
Notes to Required Supplementary Information – Budgetary Comparison Schedules .....	41-43
Required Supplementary Information – Schedule of the South Carolina First Steps to School Readiness' Proportionate Share of the Net Pension Liability – South Carolina Retirement System.....	44
Required Supplementary Information – Schedule of the South Carolina First Steps to School Readiness' Contributions – South Carolina Retirement System .....	45
Required Supplementary Information – Schedule of the South Carolina First Steps to School Readiness' Proportionate Share of the Net OPEB Liability – South Carolina Health Insurance Trust Fund.....	46
Required Supplementary Information – Schedule of the South Carolina First Steps to School Readiness' Contributions – South Carolina Health Insurance Trust Fund .....	47
Independent Auditor's Report – Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i> .....	49-50



# Greene Finney, LLP

CERTIFIED PUBLIC ACCOUNTANTS & ADVISORS

## INDEPENDENT AUDITOR'S REPORT

Mr. George L. Kennedy, CPA  
State Auditor  
Office of the State Auditor  
Columbia, South Carolina

### Report on the Financial Statements

We have audited the accompanying financial statements of the governmental activities and each major fund of South Carolina First Steps to School Readiness ("First Steps"), a nonmajor discretely presented component unit of the State of South Carolina, as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise First Steps' basic financial statements as listed in the table of contents.

### *Management's Responsibility for the Financial Statements*

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### *Auditor's Responsibility*

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

### *Opinions*

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities and each major fund of South Carolina First Steps to School Readiness as of June 30, 2019, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

---

GREENEFINNEY.COM · INFO@GREENEFINNEY.COM

MAULDIN, SC  
864.232.5204

CHARLESTON, SC  
843.735.5805

SPARTANBURG, SC  
864.232.5204

ASHEVILLE, NC  
828.771.0847  
OPEN BY APPOINTMENT ONLY

### ***Change in the Reporting Entity***

As discussed in Note I.B to the financial statements, First Steps' reporting entity was changed for the year ended June 30, 2019 to include the assets, liabilities and equity of the private 4K program that is administered throughout the State. Our opinion is not modified with respect to this matter.

### ***Other Matters***

#### ***Required Supplementary Information***

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis, budgetary comparison schedules, schedule of proportionate share of the net pension liability – South Carolina Retirement System, schedule of contributions – South Carolina Retirement System, schedule of proportionate share of the net OPEB liability – South Carolina Health Insurance Trust Fund, and schedule of contributions – South Carolina Health Insurance Trust Fund, as listed in the table of contents, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

### ***Other Reporting Required by Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated September 25, 2019 on our consideration of First Steps' internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering First Steps' internal control over financial reporting and compliance.



Greene Finney, LLP  
Mauldin, South Carolina  
September 25, 2019

**South Carolina First Steps to School Readiness  
Management's Discussion and Analysis  
For the Year Ended June 30, 2019**

The Management's Discussion and Analysis ("MD&A") of the South Carolina First Steps to School Readiness Board of Trustees provides an overview of the financial activities for the year ended June 30, 2019.

**FINANCIAL HIGHLIGHTS**

The South Carolina First Steps to School Readiness ("First Steps") prepared its financial statements in accordance with Generally Accepted Accounting Principles ("GAAP") and follows pronouncements from the Governmental Accounting Standards Board ("GASB").

As of and for the year ended June 30, 2019:

- First Steps' total net position decreased by \$246,800 and its liabilities and deferred inflows of resources exceeded its assets and deferred outflows of resources (net position) by \$2,098,735, which includes \$6,768,572 in net position restricted for the 4K pre-school program and early childhood services.
- First Steps received \$34,918,237 in appropriations from the State of South Carolina, the significant majority of which was disbursed for funding the county partnerships and the 4K programs throughout the state.
- First Steps received federal, local, and private grants totaling \$1,124,965.

**USING THESE AUDITED FINANCIAL STATEMENTS**

The audited financial statements presented in this document include both government-wide and fund financial statements.

**Government-wide Statements:**

Government-wide statements include a Statement of Net Position and a Statement of Activities. These statements display information about First Steps as a whole. The government-wide financial statements of First Steps are presented on the accrual basis of accounting and provide short-term and long-term information about First Steps.

**Fund Statements:**

The fund financial statements include the governmental funds' Balance Sheet and Statement of Revenue, Expenditures, and Change in Fund Balances. The governmental fund financial statements are presented on the modified accrual basis of accounting which focus on the near term inflows and outflows of resources available for expenditure for the fiscal year.

First Steps was created specifically to carry out the objectives of The South Carolina First Steps to School Readiness Act and to lessen the burdens on government by overseeing the initiative for improving early childhood development of the Act.

**South Carolina First Steps to School Readiness  
Management's Discussion and Analysis  
For the Year Ended June 30, 2019**

**Statements of Net Position** –The Statements of Net Position provides a summary of First Steps' financial condition at the end of the 2019 and 2018 fiscal years; the statement reports all assets, deferred outflows of resources, liabilities, and deferred inflows of resources using the accrual basis of accounting.

**SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
STATEMENTS OF NET POSITION**

	2019	2018*
Current assets	\$ 15,272,350	\$ 15,286,009
Capital assets, net	71,235	350,375
Total assets	<u>15,343,585</u>	<u>15,636,384</u>
Deferred outflows of resources	<u>2,509,703</u>	<u>4,014,817</u>
Current liabilities	1,768,423	1,700,085
Net pension liability	7,063,997	11,321,231
Net OPEB liability	4,812,069	7,636,576
Other noncurrent liabilities	89,558	117,076
Total liabilities	<u>13,734,047</u>	<u>20,774,968</u>
Deferred inflows of resources	<u>6,217,976</u>	<u>728,168</u>
Net investment in capital assets	71,235	350,375
Restricted	6,768,572	10,930,807
Unrestricted	<u>(8,938,542)</u>	<u>(13,133,117)</u>
Total net position, as restated	<u><u>\$ (2,098,735)</u></u>	<u><u>\$ (1,851,935)</u></u>

*\* The amounts presented for 2018 have been restated to include the Private 4K special revenue fund, whose addition in the current year financial statements represented a change in reporting entity. As such, all periods presented have been restated to include this fund. In addition, amounts reported for 2018 have been reclassified to conform to current year presentation.*

Current assets have decreased from \$15,286,009 at June 30, 2018 to \$15,272,350 at June 30, 2019 which is a decrease of \$13,659. This is primarily due to a decrease in cash which resulted from First Steps not expending all State appropriations it received during the year and drawing upon carried over cash reserves for its program mission. Total liabilities decreased from \$20,774,968 at June 30, 2018 to \$13,734,047 at June 30, 2019, which is a decrease of \$7,040,921. The primary cause of the decrease is related to First Steps' proportionate share of the State's net pension and OPEB liabilities which were substantially reduced in correlation with First Steps' reduction in staffing. The reduction in staffing was due to the transition of the BabyNet program to another agency during the year ended June 30, 2018 (net pension and OPEB liabilities are measured as of June 30, 2018 for First Steps' fiscal year ended June 30, 2019).

First Steps reported negative unrestricted net position of \$(8,938,542) which is due primarily to its proportionate share of the net pension and OPEB liabilities of \$11,876,066. First Steps does not anticipate funding these liabilities and will continue to contribute to the respective plans at State required contribution rates.



**South Carolina First Steps to School Readiness  
Management's Discussion and Analysis  
For the Year Ended June 30, 2019**

**Statements of Activities** – The Statements of Activities reports the revenues and expenses during the 2019 and 2018 fiscal years.

**SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
STATEMENTS OF ACTIVITIES**

	2019	2018*
<b>Program Revenues</b>		
Federal and state grants	\$ 519,223	\$ 7,396,996
Medicaid reimbursements	—	178,280
Local and private grants	614,780	67,557
Total program revenues	<u>1,134,003</u>	<u>7,642,833</u>
<b>General Revenues</b>		
State appropriations	34,918,237	35,904,451
Interest income	345,195	194,924
Total general revenues	<u>35,263,432</u>	<u>36,099,375</u>
Total revenues	<u>36,397,435</u>	<u>43,742,208</u>
<b>Expenses</b>		
Allocations to other entities	13,620,688	15,932,007
Private 4K programmatic costs	15,247,943	11,993,777
Contractual services	2,174,818	4,898,214
Salaries	2,399,279	2,949,305
Employer fringe benefits	848,645	3,068,059
Rent and leases	252,043	424,710
Materials	1,512,977	2,767,428
Travel	308,702	572,821
Loss on disposal of capital assets	197,867	267,035
Depreciation	81,273	88,000
Total expenses	<u>36,644,235</u>	<u>42,961,356</u>
(Decrease) increase in net position	(246,800)	780,852
Net position beginning balance, as restated*	<u>(1,851,935)</u>	<u>(2,632,787)</u>
Net position ending balance	<u>\$ (2,098,735)</u>	<u>\$ (1,851,935)</u>

*\* The amounts presented for 2018 have been restated to include the Private 4K special revenue fund, whose addition in the current year financial statements represented a change in reporting entity. As such, all periods presented have been restated to include this fund.*

**South Carolina First Steps to School Readiness  
Management's Discussion and Analysis  
For the Year Ended June 30, 2019**

Operating revenues of First Steps are largely dependent upon appropriations from the State of South Carolina as well as grants from the Federal government. The decrease in net position is primarily attributed to State budget funds being fully expended and First Steps' spending carried over cash from prior years, resulting in a decrease in net position. First Steps' total expenses decreased from \$42,961,356 for the year ended June 30, 2018 to \$36,644,235 for the year ended June 30, 2019 which was a decrease of \$6,317,121. First Steps transferred its Early Head Start program to the Department of Social Services ("DSS") during the year ended June 30, 2019. As a result, revenues also decreased from \$43,742,208 for the year ended June 30, 2018 to \$36,397,435 for the year ended June 30, 2019, which is a decrease of \$7,344,773. Private 4K programmatic costs increased from \$11,993,777 for the year ended June 30, 2018 to \$15,247,943 for the year ended June 30, 2019, which was an increase of \$3,254,166. This increase is primarily due to the growth of the program throughout the State as a result of the efforts of First Steps.

Total program revenues decreased by \$6,508,830 as compared to the year ended June 30, 2018 primarily due to First Steps transitioning the Early Head Start program to DSS during the year ended June 30, 2019. Total general revenues decreased by \$835,943. This decrease was also due primarily to the underlying funding appropriated by the State. First Steps realized a decrease in net position from the prior year in the amount of \$246,800.

**Funds Highlights:**

*Governmental Funds:*

The focus of First Steps' governmental funds is to provide information regarding actual inflows and outflows of spendable resources. The General Fund is the primary operating fund of First Steps, while the Private 4K special revenue fund accounts for the private activities of the 4K program administered by First Steps.

The General Fund's operating revenues are primarily appropriations from the State of South Carolina and previously, federal grants. For state appropriations, revenues are not budgeted by First Steps, therefore, expenditures are typically matched with appropriations so long as expenditures do not exceed budget. State appropriations and other revenues exceeded First Steps' program expenses resulting in expenditures exceeding revenues by \$115,199 for the year ended June 30, 2019. This resulted in a decrease in fund balance from the beginning fund balance amount of \$13,713,896 to \$13,598,697, which includes \$6,766,069 in fund balance restricted for the 4K pre-school program and early childhood services and \$6,832,628 in unassigned fund balance.

The Private 4K special revenue fund's operating revenues are primarily appropriations from the State of South Carolina, and, like the general fund, expenditures are typically matched with these revenues. The Private 4K special revenue fund received total revenues of \$15,257,660 and expended \$15,255,488 during the year ended June 30, 2019, resulting in an increase in fund balance of \$2,172. The special revenue fund reports \$3,718 in nonspendable fund balance related to prepaid expenses as of June 30, 2019, and all of the remaining special revenue fund's fund balance is restricted.

**Capital Assets:**

First Steps did not purchase any capital assets during the year ended June 30, 2019. First Steps did dispose of 14 vehicles as a result of the transition of the Early Head Start program and those vehicles were transferred to the new service provider. As a result, a loss on disposal of \$197,867 was recorded by First Steps.

**South Carolina First Steps to School Readiness  
Management's Discussion and Analysis  
For the Year Ended June 30, 2019**

**Noncurrent Liabilities:**

First Steps' noncurrent liabilities consist of compensated absences and its proportionate share of the State of South Carolina's net pension and net OPEB liabilities related to the South Carolina Retirement System ("SCRS"). The compensated absences liability includes accrued annual leave earned for which the employees are entitled to paid time off or payment at termination. Compensated absences used or transferred to another agency during the fiscal year were \$232,900 while another \$174,352 were accrued. See note 5 to the financial statements for additional information regarding First Steps' noncurrent liabilities.

First Steps' net pension liability has been recorded in accordance with GASB Statement No. 68 and represents First Steps' share of the State's net pension liability related to the SCRS. The net pension liability as of June 30, 2018 was \$11,321,231 and at June 30, 2019, it had decreased to \$7,063,997. The decrease is due to a reduction in participants applicable to First Steps. GASB Statement No. 68 does not affect First Steps' required contributions to the net pension liability. See note 6 to the financial statements for additional information regarding First Steps' pension plan.

First Steps' is also required to record its proportionate share of the net OPEB liability in accordance with GASB Statement No. 75 and represents First Steps' share of the State's net OPEB liability related to the State's Retiree Health Insurance Trust Fund. The net OPEB liability as of June 30, 2018 was \$7,636,576 and decreased to \$4,812,069 at June 30, 2019, also due to a decrease in participants applicable to First Steps. See note 7 to the financial statements for additional information regarding First Steps' OPEB plan.

**Budget Highlights:**

First Steps budgets State appropriations and other funds (earmark, restricted and federal) as they are received during the year. First Steps' original and final budget for the General Fund was \$6,521,510 and \$6,582,010, respectively, for the year ended June 30, 2019. Actual expenditures, on the budgetary basis, totaled \$6,575,537. These amounts were spent primarily on the CDEPP programs (child development program). The total other funds original and final budget was \$35,519,369 with actual expenditures of \$30,912,754. The amount of expenditures budgeted exceeded actual expenditures as First Steps was not able to expand its programs rapidly enough during the year to consume all budgeted amounts. Those funds will be used in future fiscal years.

**Current Conditions that are expected to have a Significant Effect on First Steps' Financial Position:**

Due to the continually increasing costs of services central to the First Steps' mission and operations, First Steps does intend to request additional budgetary funding from the State of South Carolina General Assembly in future fiscal years to help ensure that these programs continue for the benefit of the State. The South Carolina General Assembly and the Governor reauthorized First Steps with its Legislative Bill H3591 effective July 1, 2018. Bill H3591 extended SC First Steps authorization from July 1, 2018 (FY 19) thru June 30, 2025 (FY 25).

This discussion and analysis is designed to provide a general overview of the South Carolina First Steps to School Readiness' finances for all of South Carolina's citizens, taxpayers, customers, investors and creditors. This financial report seeks to demonstrate First Steps' accountability for the money it receives. Questions concerning any of the information provided in this report or requests for additional information should be addressed to:

South Carolina First Steps to School Readiness  
1300 Sumter Street, Suite 100  
Columbia, South Carolina 29201

**South Carolina First Steps to School Readiness  
Statement of Net Position  
June 30, 2019**

**ASSETS**

Current assets:

Cash and cash equivalents	\$ 14,124,857
Due from grantors	527,887
Due from local partnerships	615,888
Prepaid expenses	3,718
Total current assets	<u>15,272,350</u>

Noncurrent assets:

Capital assets, net	<u>71,235</u>
Total noncurrent assets	<u>71,235</u>
Total assets	<u>15,343,585</u>

**DEFERRED OUTFLOWS OF RESOURCES**

Deferred outflows of resources related to pensions	2,273,242
Deferred outflows of resources related to OPEB	236,461
Total deferred outflows of resources	<u>2,509,703</u>

**LIABILITIES**

Current liabilities:

Accounts payable	1,390,976
Accrued salaries and benefits	276,456
Compensated absences	100,991
Total current liabilities	<u>1,768,423</u>

Noncurrent liabilities:

Compensated absences	89,558
Net OPEB liability	4,812,069
Net pension liability	7,063,997
Total noncurrent liabilities	<u>11,965,624</u>
Total liabilities	<u>13,734,047</u>

**DEFERRED INFLOWS OF RESOURCES**

Deferred inflows of resources related to OPEB	3,252,292
Deferred inflows of resources related to pensions	2,965,684
Total deferred inflows of resources	<u>6,217,976</u>

**NET POSITION**

Net investment in capital assets	71,235
Restricted for the 4K pre-school program and early childhood services	6,768,572
Unrestricted	<u>(8,938,542)</u>
Total Net Position	<u>\$ (2,098,735)</u>

*The notes to the financial statements are an integral part of these financial statements. See accompanying independent auditor's report.*

**South Carolina First Steps to School Readiness  
Statement of Activities  
For the Year Ended June 30, 2019**

**Expenses**

**Governmental Activities – General Government**

Allocations to other entities	\$ 13,620,688
Private 4K programmatic costs	15,247,943
Contractual services	2,174,818
Salaries	2,399,279
Employer fringe benefits	848,645
Rent and leases	252,043
Materials	1,512,977
Travel	308,702
Loss on disposal of capital assets	197,867
Depreciation	81,273
Total expenses	<u>36,644,235</u>

**Program Revenues – Operating Grants and Contributions**

Federal and state grants	519,223
Local and private grants	614,780
Total program revenues	<u>1,134,003</u>
Net expenses	<u>(35,510,232)</u>

**General Revenues**

State appropriations	34,918,237
Interest income	345,195
Total general revenues	<u>35,263,432</u>

Decrease in net position	(246,800)
Net position, July 1, 2018, as restated	<u>(1,851,935)</u>
Net position, June 30, 2019	<u>\$ (2,098,735)</u>

*The notes to the financial statements are an integral part of these financial statements. See accompanying independent auditor's report.*

**South Carolina First Steps to School Readiness  
Balance Sheet -  
Governmental Funds  
June 30, 2019**

	<u>General Fund</u>	<u>Private 4K Special Revenue Fund</u>	<u>Total</u>
<b>ASSETS</b>			
Cash and cash equivalents	\$ 13,140,975	\$ 983,882	\$ 14,124,857
Due from grantors	527,887	—	527,887
Due from local partnerships	615,888	—	615,888
Due from General Fund	—	317,000	317,000
Prepaid expenses	—	3,718	3,718
Total Assets	<u>\$ 14,284,750</u>	<u>\$ 1,304,600</u>	<u>\$ 15,589,350</u>
<b>LIABILITIES</b>			
Accounts payable	\$ 92,597	\$ 1,298,379	\$ 1,390,976
Accrued salaries and benefits	276,456	—	276,456
Due to Private 4K Special Revenue Fund	317,000	—	317,000
Total liabilities	<u>686,053</u>	<u>1,298,379</u>	<u>1,984,432</u>
<b>FUND BALANCE</b>			
Nonspendable	—	3,718	3,718
Restricted for the 4K pre-school program and early childhood services	6,766,069	2,503	6,768,572
Unassigned	6,832,628	—	6,832,628
Total fund balance	<u>13,598,697</u>	<u>6,221</u>	<u>13,604,918</u>
Total liabilities and fund balance	<u>\$ 14,284,750</u>	<u>\$ 1,304,600</u>	<u>\$ 15,589,350</u>

*The notes to the financial statements are an integral part of these financial statements. See accompanying independent auditor's report.*

**South Carolina First Steps to School Readiness  
Reconciliation of the Balance Sheet of the Governmental Funds  
to the Statement of Net Position  
June 30, 2019**

Total fund balance, governmental fund	\$ 13,604,918
Amounts reported for governmental activities in the Statement of Net Position are different because:	
Capital assets used in governmental activities are not current financial resources and therefore are not reported in the fund financial statements, but are reported in governmental activities in the Statement of Net Position. This amount reflects gross capital assets of \$278,945 net of accumulated depreciation of \$207,710.	71,235
The net pension and net OPEB liabilities and related deferred inflows and outflows of resources are not due and payable in the current year and are not included in the fund financial statements, but are included in governmental activities in the Statement of Net Position.	
Net pension liability	(7,063,997)
Net OPEB liability	(4,812,069)
Deferred outflows of resources related to pensions	2,273,242
Deferred inflows of resources related to pensions	(2,965,684)
Deferred outflows of resources related to OPEB	236,461
Deferred inflows of resources related to OPEB	(3,252,292)
Compensated absences are not due and payable in the current period and are not included in the fund financial statements, but are included in the governmental activities in the Statement of Net Position	(190,549)
Net position of governmental activities in the Statement of Net Position	\$ (2,098,735)

*The notes to the financial statements are an integral part of these financial statements. See accompanying independent auditor's report.*

**South Carolina First Steps to School Readiness  
Statement of Revenues, Expenditures, and Change in Fund Balance -  
Governmental Funds  
For the Year Ended June 30, 2019**

	<u>General Fund</u>	<u>Private 4K Special Revenue Fund</u>	<u>Total</u>
<b>Revenues</b>			
State appropriations	\$ 19,660,737	\$ 15,257,500	\$ 34,918,237
Federal and state grants	482,905	—	482,905
Local and private grants	614,780	—	614,780
Interest income	345,035	160	345,195
Total revenues	<u>21,103,457</u>	<u>15,257,660</u>	<u>36,361,117</u>
<b>Expenditures</b>			
Allocations to other entities	13,620,688	—	13,620,688
Private 4K programmatic costs	—	15,247,943	15,247,943
Contractual services	2,174,818	—	2,174,818
Salaries	2,457,827	—	2,457,827
Employer fringe benefits	899,146	—	899,146
Materials	1,505,432	7,545	1,512,977
Travel	308,702	—	308,702
Rent and leases	252,043	—	252,043
Total expenditures	<u>21,218,656</u>	<u>15,255,488</u>	<u>36,474,144</u>
Increase in fund balance	(115,199)	2,172	(113,027)
Fund balance, July 1, 2018, as restated	13,713,896	4,049	13,717,945
Fund balance, June 30, 2019	<u>\$ 13,598,697</u>	<u>\$ 6,221</u>	<u>\$ 13,604,918</u>

*The notes to the financial statements are an integral part of these financial statements. See accompanying independent auditor's report.*



**South Carolina First Steps to School Readiness  
Reconciliation of the Statement of Revenues, Expenditures,  
and Change in Fund Balance of the Governmental Funds to the  
Statement of Activities  
For the Year Ended June 30, 2019**

Net change in fund balance, governmental fund	\$ (113,027)
Amounts reported for governmental activities in the Statement of Activities are different because:	
Current year retirement plan contributions are considered a deferred outflow of resources rather than a current year expense in the Statement of Activities	351,180
Current year OPEB contributions are considered a deferred outflow of resources rather than a current year expense in the Statement of Activities	145,923
Nonemployer contributions to the OPEB plan are recognized in the Statement of Activities as revenues	36,318
The loss on disposal of capital assets is only recognized in the Statement of Activities as it does not use current financial resources	(197,867)
Some expenses reported in the Statement of Activities do not require the use of current financial resources and therefore are not reported as expenditures in the governmental fund:	
Depreciation	(81,273)
Increase in pension expense due to changes in First Steps' portion of collective pension expense	(620,743)
Decrease in OPEB expense due to changes in First Steps' portion of collective OPEB expense	174,141
Compensated absences	58,548
	<hr/>
Decrease in net position, governmental activities	<u>\$ (246,800)</u>

*The notes to the financial statements are an integral part of these financial statements. See accompanying independent auditor's report.*

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies**

**A. Reporting Entity**

The South Carolina First Steps to School Readiness (“First Steps”) is a non-profit, tax-exempt public charity created specifically to carry out the objectives of The South Carolina First Steps to School Readiness Act and to lessen the burdens on government by overseeing the initiative for improving early childhood development of the Act. First Steps was created through enabling legislation recorded in June of 1999 in Section 59-152-10 of the South Carolina Code of Laws. First Steps is financially accountable to and dependent on the State and is subject to various State procurement, budget, personnel, and other regulations. First Steps is reported as a discretely presented component unit of the State of South Carolina and included in the State's Comprehensive Annual Financial Report.

Operationally, the SC First Steps Executive Director reports to a State Board of Trustees, consisting of 25 voting members and the heads of all South Carolina child-serving agencies. The board is chaired by the Governor of the State of South Carolina (the “Governor”). The Board’s voting members include the Governor or the Governor’s designee, State Superintendent of Education or the State Superintendent of Education’s designee, seven Governor appointees, four members appointed by the President Pro Tempore of the Senate, four members appointed by the Speaker of the House of Representatives, the Chairman of the Senate Education Committee, the Chairman of the House Education and Public Works Committee, and the Chief Executive Officers of the Department of Social Services, Department of Health and Environmental Control, Department of Health and Human Services, Department of Disabilities and Special Needs, State Head Start Collaboration Officer, and Children’s Trust of South Carolina. First Steps accomplishes its directives through the use of 46 county partnerships which cover all counties within the state of South Carolina. Each local partnership has its own governing board based on the enabling law, and employs staff as determined by the local board.

First Steps was enacted to help improve school readiness outcomes for the state’s youngest learners and to create public-private partnerships to strengthen the system of early education and care statewide. First Steps implements specific and targeted programs through five broad categories in communities across the state: 1) Family Strengthening, 2) Childcare, 3) Early Education, 4) School Transition, and 5) Health. Each South Carolina county has a First Steps Partnership (with Internal Revenue Service not-for-profit 501(c)3 status), comprised of business and community leaders, early education professionals, parents, faith-based and agency partners. Local First Steps partnerships examine unmet needs in their communities to help local young children and their families. Through its Internal Revenue Service not-for-profit 501(c)3 status, First Steps mobilizes resources beyond state appropriated dollars, leveraging local private and public funds, federal grants, planned gifts, in-kind contributions, and volunteer hours.

In addition, First Steps was a federal grant recipient for the State’s Early Head Start program which prepares children up to 3 years old for school. During the year ended June 30, 2019, First Steps relinquished the federal grant which was secured by another organization. First Steps transferred fourteen vehicles to the new service provider as well as downsized the number of staff when this transition occurred.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**A. Reporting Entity (continued)**

First Steps also co-administers the state's 4-K pre-school program known as the Child Development Education Pilot Program which provides full-day pre-kindergarten to eligible children in both public and private settings. The private portion of this program is included in the Private 4K special revenue fund. South Carolina First Steps serves as the state coordinator for Nurse-Family Partnership and Parents as Teachers. Finally, by Executive Order, First Steps serves as South Carolina's Early Childhood Advisory Council under the federal Head Start reauthorization of 2007.

**B. Basis of Presentation, Measurement Focus and Basis of Accounting**

**Government-wide Financial Statements**

The government-wide financial statements are presented in accordance with Generally Accepted Accounting Principles ("GAAP") using the accrual basis of accounting and following pronouncements issued by the Governmental Accounting Standards Board ("GASB").

All of the functions available to finance First Steps are presented together as general government activities. Financial information for funds that are not available to finance these activities are not included; consequently, the government-wide financial statements exclude fiduciary assets and liabilities, when applicable.

**Fund Financial Statements**

The fund financial statements are used to report First Step's financial position and results of operations as well as to demonstrate legal compliance and to aid financial management by segregating transactions related to certain government functions or activities. The governmental fund statements are presented on the modified accrual basis. These methods of accounting are described below.

**Measurement Focus and Basis of Accounting**

The government-wide financial statements are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned or for non-exchange transactions, when all eligibility requirements have been met, and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows.

Governmental fund financial statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are recognized as soon as they are both measureable and available. "Measureable" means that the amount of the transaction can be determined and "available" means collectible within the current period or soon enough thereafter to pay obligations of the current period. For this purpose, First Steps considers major sources of revenues to be available if they are collected within sixty days of the end of the current fiscal year.

**Governmental Fund Types**

General Fund – The General Fund, a major fund, is the operating fund of First Steps and is used to account for all financial transactions and resources with the exception of the private 4K program.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**B. Basis of Presentation, Measurement Focus and Basis of Accounting (continued)**

**Governmental Fund Types (continued)**

Private 4K Special Revenue Fund – The Private 4K Special Revenue Fund is a major special revenue fund of First Steps. The fund accounts for the private 4K program, which offers families choices of pre-kindergarten within both public-school districts and eligible private settings. Private 4K Programs focus on the developmental and learning supports that children must have in order to be ready for school and incorporate evidence-based practices, ongoing assessment and parenting education.

**Cash and Cash Equivalents**

The amounts shown in the accompanying financial statements as *cash and cash equivalents* represent petty cash, cash on deposit in banks, cash equivalents on deposit with external parties, and cash invested in various instruments as a part of the State's cash management pool, an internal investment pool. The internal investment pool is not registered with the Securities and Exchange Commission and does not have other regulatory oversight. Because the cash management pool operates as a demand deposit account, amounts invested in the pool are classified as cash and cash equivalents. The pool includes some long-term investments such as obligations of the United States and certain agencies of the United States, obligations of domestic corporations, certificates of deposit, and collateralized repurchase agreements.

**Cash Management Pool – Allocation of Interest**

The State of South Carolina cash management pool consists of a general deposit account and several special deposit accounts. The State records each fund's equity interest in the general deposit account. All earnings on that account are recorded in the General Fund of the State of South Carolina. In contrast, each special deposit account retains its own earnings.

**Investment Holdings and Basis**

The South Carolina State Treasurer's Office (the "Office") is authorized by statute to invest all State funds. The Office's investment objectives are preservation of capital, maintenance of adequate liquidity, and obtaining the best yield possible within prescribed parameters. To meet those objectives, the Office uses various resources including an investment advisory service, electronic financial quotation and information services, various economic reports, and daily communication with brokers and financial institution investment officers.

To ensure safety of principal, the Office's policy is to limit liquid investments (i.e., those with maturities not exceeding one year) to cash, repurchase agreements (when collateralized by United States Treasury, federal agency or other federally guaranteed obligations with a market value in excess of 100.0% of funds advanced), United States Treasury bills, federal agency discount notes, and commercial paper.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**B. Basis of Presentation, Measurement Focus and Basis of Accounting (continued)**

**Investment Holdings and Basis (continued)**

The Office further preserves principal by investing in only the highest investment grade securities. In order to diversify investment holdings, asset allocation policies are utilized for investments having more than one year to maturity. Overall credit exposure is managed by asset allocation policies and by additional constraints controlling risk exposure to individual corporate issuers. Substantially all of the State's investments are presented at fair value; securities are valued at the last reported sales price as provided by an independent pricing service.

More information pertaining to the carrying amounts, fair value, credit and other risks of the cash management pool that First Steps participates in as required under GASB Statement No. 40, *Deposits and Investments – Risk Disclosures* and GASB Statement No. 72, *Fair Value Measurement and Application*, are disclosed in the Comprehensive Annual Financial Report of the State of South Carolina.

**Due from Grantors**

Amounts reported as due from grantors represent amounts that have been expended by First Steps and are reimbursable by the grantor agency, but not received by First Steps, as of June 30, 2019.

**Due from Local Partnerships**

Amounts reported as due from local partnerships represent previously allocated amounts that have not been spent by the local partnerships. First Steps' is requiring the return of these funds from the local partnerships to be distributed in the future. Allocations to other entities has been reduced by the amount of this receivable for the year ended June 30, 2019.

**Capital Assets**

First Steps reports its capital assets in the governmental activities in the government-wide financial statements.

First Steps' capital assets are valued at historical cost or at estimated historical cost if actual historical cost data is not available. Donated capital assets are recorded at estimated acquisition value on the donation date. The costs of normal maintenance and repairs that do not significantly add to the value of an asset or materially extend an asset's useful life are not capitalized.

An individual asset is capitalized and reported if it has an estimated useful life of at least two years and a historical cost of more than \$5,000 for buildings, machinery, vehicles, and equipment. All land and non-depreciable land improvements are capitalized and reported, regardless of cost. Once First Steps places a depreciable capital asset in service, depreciation is recorded using the straight-line method over the following useful lives:

<u>Asset Category</u>	<u>Years</u>
Equipment and computer software	5
Vehicles	5

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**B. Basis of Presentation, Measurement Focus and Basis of Accounting (continued)**

**Compensated Absences**

Generally, all permanent full-time State employees and certain part-time employees scheduled to work at least one-half of the First Step's work month are entitled to accrue and carry forward at calendar year-end maximums of 180 days sick leave and 45 days annual vacation leave. Upon termination of State employment, employees are entitled to be paid for accumulated unused annual vacation leave up to the maximum, but are not entitled to any payment for unused sick leave. The compensated absences liability includes accrued annual leave earned for which the employees are entitled to paid time off or payment at termination. The entire unpaid liability for which First Steps expects to compensate employees through paid time off or cash payments, inventoried at fiscal year-end current salary costs and the cost of the salary-related benefit payments, is recorded as a liability.

**Fund Balance and Net Position**

*Fund Balance*

First Steps reports fund balance in accordance with GASB Statement No. 54, *Fund Balance Reporting and Governmental Fund Type Definitions*. The objective of this statement is to enhance the usefulness of fund balance information by providing clearer fund balance classifications that can be more consistently applied and by clarifying the existing governmental fund type definitions.

The following categories of fund balance are being used in the fund level financial statement of the governmental fund:

**Nonspendable fund balance**

The nonspendable fund balance classification includes amounts that cannot be spent because they are either not in spendable form or legally or contractually required to be maintained intact. The "not in spendable form" criterion includes items that are not expected to be converted to cash, for example, inventories and prepaid amounts. It also includes the long-term amount of loans and notes receivable, as well as other assets. As of June 30, 2019, First Steps' nonspendable fund balance was \$3,718 for prepaid expenses.

**Restricted fund balance**

The restricted fund balance classification includes amounts that are either restricted externally by creditors, grantors, contributors, or laws or regulations of other governments or restricted by law through constitutional provisions or enabling legislation. As of June 30, 2018, First Steps' restricted fund balance consisted of state appropriations restricted for the 4K pre-school program and early childhood services.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**B. Basis of Presentation, Measurement Focus and Basis of Accounting (continued)**

**Fund Balance and Net Position (continued)**

*Fund Balance (continued)*

Committed fund balance

The committed fund balance classification includes amounts that can only be used for specific purposes pursuant to constraints imposed by formal action of First Steps' highest level of decision-making authority. Those committed amounts cannot be used for any other purpose unless First Steps removes or changes the specified use by taking the same type of action it employed to previously commit those amounts. Committed fund balances also incorporate contractual obligations to the extent that existing resources in the fund have been specifically committed for use in satisfying those contractual requirements. As of June 30, 2019, First Steps did not have any committed fund balance.

Assigned fund balance

The assigned fund balance classification includes amounts that are constrained by First Steps' intent to be used for specific purposes but are not restricted or committed. The authority for making an assignment is not required to be First Steps' highest level of decision-making authority and as such, the nature of the actions necessary to remove or modify an assignment does not require First Steps' highest level of authority. As of June 30, 2019, First Steps did not have any assigned fund balance.

Unassigned fund balance

The unassigned fund balance classification includes amounts that have not been assigned to other funds and has not been restricted, committed, or assigned for specific purposes within the General Fund.

Based on First Steps' policies regarding fund balance classifications as noted above, First Steps considers amounts that are restricted, committed, or assigned to be spent when the corresponding expenditure that has been designated by the State or donors has been made. After these fund balances have been depleted, unassigned fund balance will be considered to have been spent.

*Net Position*

First Steps reports net position in accordance with GASB Statement No. 63, *Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position*.

The following categories of net position are used in the Statement of Net Position:

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**B. Basis of Presentation, Measurement Focus and Basis of Accounting (continued)**

**Fund Balance and Net Position (continued)**

*Net Position (continued)*

Restricted net position

Restricted net position consists of assets with constraints placed on the use either by external groups such as creditors, grantors, contributors, or laws or regulations of other governments; or law through constitutional provisions or enabling legislation. In all cases, if individual restricted net position categories are negative, the negative balance is eliminated and reclassified against unrestricted net position. As of June 30, 2019, First Steps' restricted net position consisted of state appropriations restricted for the 4K program and early childhood services.

Net Investment in Capital Assets

The net investment in capital assets component of net position consists of capital assets, net of accumulated depreciation, reduced by any outstanding balances of bonds, mortgages, notes, or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.

Unrestricted Net Position

The unrestricted component of net position is the net amount of assets, deferred outflows of resources, liabilities, and deferred inflows of resources that are not included in the determination of net investment in capital assets or the restricted component of net position.

First Steps' policy is to first apply restricted resources when an expense is incurred for purposes for which both restricted and unrestricted net position are available.

Deficit Net Position

First Steps reported negative unrestricted net position of \$8,938,542 which is due primarily to its proportionate share of the net pension liability and OPEB liability of \$7,063,997 and \$4,812,069, respectively (see notes 6 and 7 for more details). First Steps will not be required to fully fund these liabilities in any given year, however, they will continue to contribute to the pension plan at State required contribution rates.

**Change in Reporting Entity**

During the year ended June 30, 2019, First Steps reporting entity was modified to include the assets, liabilities, fund balance / net position, of the private 4K program that is administered throughout the State. As a result of the change in reporting entity, beginning net position and total fund balance was restated to include the balances of the Private 4K Program special revenue fund. The effect of this change is detailed below:



SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**1. Summary of Significant Accounting Policies (continued)**

**B. Basis of Presentation, Measurement Focus and Basis of Accounting (continued)**

**Change in Reporting Entity (continued)**

Government Wide Financial Statements	
Net position at June 30, 2018, as originally reported	\$ (1,855,984)
Inclusion of Private 4K Program net position	4,049
Net position at June 30, 2018, as restated	<u>\$ (1,851,935)</u>
Governmental Funds Financial Statements	
Fund balance at June 30, 2018, as originally reported	\$ 13,713,896
Inclusion of Private 4K Program fund balance	4,049
Fund balance at June 30, 2018, as restated	<u>\$ 13,717,945</u>

At June 30, 2018, the Private 4K Program held assets of \$805,088 and liabilities of \$801,039 resulting in the net position and fund balance of \$4,049 being included in the table above.

**2. Budget Policy**

First Steps is granted an annual appropriation for operating purposes by the South Carolina General Assembly. The appropriation as enacted becomes the legal operating budget for First Steps' general fund. The Private 4K special revenue fund does not have a legally adopted budget. The Appropriation Act authorizes expenditures from funds appropriated from the General Fund of the State and authorizes expenditures of total funds. The "Total Funds" column in the Appropriation Act for each individual budgetary unit authorizes expenditures from all budgeted resources. A revenue budget is not adopted for individual budgetary funds. Budgetary control is maintained at the line-item level of the budgetary entity. Agencies may process disbursement vouchers in the State's budgetary accounting system only if enough cash and appropriation authorization exist.

Transfers of funds may be approved by the State Fiscal Accountability Authority, previously known as the State Budget and Control Board, under its authority or by the agency as set forth in Appropriation Act Proviso 117.9 as follows: Agencies and institutions shall be authorized to transfer appropriations within programs and within the agency with notification to the Executive Budget Office. No such transfer may exceed twenty percent of the program budget. Upon request, details of such transfers may be provided to members of the General Assembly on an agency by agency basis. Transfers of appropriations from personal service accounts to other operating accounts or from other operating accounts to personal service accounts may be restricted to any established standard levels set by the State Fiscal Accountability Authority upon formal approval by a majority of the members of the State Fiscal Accountability Authority.

During the fiscal year-end closeout period in July, agencies may continue to charge vendor, interagency, and interfund payments for the fiscal year to that fiscal year's appropriations. Any unexpended State General Fund monies as of June 30 automatically lapse to the General Fund of the State on July 1 unless authorization is received from the General Assembly to carry over the funds to the ensuing fiscal year. State law does not require the use of encumbrance accounting.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**3. Deposits and Investments**

By law, all deposits and investments are under the control of the South Carolina State Treasurer's Office (the "Office") except for those that, by specific authority, are under the control of other agencies or component units. The deposit and investment policies of those entities may differ from those of the Office. Typically, these agencies follow the deposit and investment policies of the Office in an effort to minimize deposit and investment risks.

The balances held by First Steps presented in these financial statements act as a demand deposit account with the Office and are therefore treated as cash and cash equivalents. The disclosures under GASB Statement No. 40, *Deposit and Investment Risk Disclosures* and GASB Statement No. 72, *Fair Value Measurement and Application*, are not required for cash and cash equivalents. However, as the First Steps deposits are generally invested in the State of South Carolina investment pool, information can be obtained from the State of South Carolina Comprehensive Annual Financial Report which can be found at [www.cg.sc.gov](http://www.cg.sc.gov).

**4. Capital Assets**

Capital asset activity for the fiscal year ended June 30, 2019, for the primary government was as follows:

	Beginning Balance <u>July 1, 2018</u>	<u>Additions</u>	<u>Disposals</u>	Ending Balance <u>June 30, 2019</u>
<b>Governmental activities</b>				
Capital assets being depreciated:				
Equipment and computer software	\$ 6,010	\$ —	\$ —	\$ 6,010
Vehicles	<u>445,103</u>	<u>—</u>	<u>(326,378)</u>	<u>118,725</u>
	<u>451,113</u>	<u>—</u>	<u>(326,378)</u>	<u>124,735</u>
Less accumulated depreciation for:				
Equipment and computer software	(6,010)	—	—	(6,010)
Vehicles	<u>(94,728)</u>	<u>(81,273)</u>	<u>128,511</u>	<u>(47,490)</u>
	<u>(100,738)</u>	<u>(81,273)</u>	<u>128,511</u>	<u>(53,500)</u>
Capital assets for governmental activities, net	<u>\$ 350,375</u>	<u>\$ (81,273)</u>	<u>\$ (197,867)</u>	<u>\$ 71,235</u>

Depreciation expense for the year ended June 30, 2019 was \$81,273. The significant decline in vehicles was due to a transitioning those vehicles to care providers as part of the transfer of the Early Head Start grant discussed in Note 1 and a loss on disposal of the assets of \$197,867 was recorded as a result of the transfer.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**5. Long-term Liabilities**

Long-term liabilities consist of compensated absences. Compensated absence activity for the fiscal year ended June 30, 2019, for the primary government was as follows:

	Beginning Balance July 1, 2018	Increases	Decreases	Ending Balance June 30, 2019	Current Portion
Compensated absences	\$ 249,097	\$ 174,352	\$ (232,900)	\$ 190,549	\$ 100,991
Total	<u>\$ 249,097</u>	<u>\$ 174,352</u>	<u>\$ (232,900)</u>	<u>\$ 190,549</u>	<u>\$ 100,991</u>

**6. Pension Plan**

The South Carolina Public Employee Benefit Authority (PEBA), which was created July 1, 2012, administers the various retirement systems and retirement programs managed by its Retirement Division. PEBA has an 11-member Board of Directors, appointed by the Governor and General Assembly leadership, which serves as co-trustee and co-fiduciary of the systems and the trust funds. By law, the State Fiscal Accountability Authority (SFAA), which consists of five elected officials, also reviews certain PEBA Board decisions regarding the funding of the South Carolina Retirement Systems (Systems) and serves as a co-trustee of the Systems in conducting that review. Effective July 1, 2017, the Retirement System Funding and Administration Act of 2017 assigned the PEBA Board of Directors as the Custodian of the Retirement Trust Funds and assigned SC PEBA and the Retirement Systems Investment Commission (RSIC) as co-trustees of the Retirement Trust Funds.

For purposes of measuring the net pension liability, deferred outflows and inflows of resources related to pensions, and pension expense, information about the fiduciary net position of the Systems and additions to/deductions from the Systems fiduciary net position have been determined on the accrual basis of accounting as they are reported by the Systems in accordance with generally accepted accounting principles (GAAP). For this purpose, revenues are recognized when earned and expenses are recognized when incurred. Benefit and refund expenses are recognized when due and payable in accordance with the terms of the plan. Investments are reported at fair value.

PEBA issues a Comprehensive Annual Financial Report (CAFR) containing financial statements and required supplementary information for the Systems' Pension Trust Funds. The CAFR is publicly available through the Retirement Benefits' link on PEBA's website at [www.peba.sc.gov](http://www.peba.sc.gov), or a copy may be obtained by submitting a request to PEBA, 202 Arbor Lake Drive, Columbia, SC 29223. PEBA is considered a division of the primary government of the state of South Carolina and therefore, retirement trust fund financial information is also included in the comprehensive annual financial report of the state.

**Plan Descriptions**

- The South Carolina Retirement System ("SCRS"), a cost-sharing multiple-employer defined benefit pension plan, was established effective July 1, 1945, pursuant to the provisions of Section 9-1-20 of the South Carolina Code of Laws for the purpose of providing retirement allowances and other benefits for employees of the state, its public school districts, and political subdivisions.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Plan Descriptions (continued)**

- The State Optional Retirement Program (“State ORP”) is a defined contribution plan that is offered as an alternative to certain newly hired state, public school, and higher education employees. State ORP participants direct the investment of their funds into a plan administered by one of four investment providers.

*Membership*

Membership requirements are prescribed in Title 9 of the South Carolina Code of Laws. A brief summary of the requirements under each system is presented below.

- SCRS - Generally, all employees of covered employers are required to participate in and contribute to the system as a condition of employment. This plan covers general employees and teachers and individuals newly elected to the South Carolina General Assembly beginning with the November 2012 general election. An employee member of the system with an effective date of membership prior to July 1, 2012, is a Class Two member. An employee member of the system with an effective date of membership on or after July 1, 2012, is a Class Three member.

- State ORP - As an alternative to membership in SCRS, newly hired state, public school, and higher education employees and individuals newly elected to the S.C. General Assembly beginning with the November 2012 general election have the option to participate in the State Optional Retirement Program (State ORP), which is a defined contribution plan. State ORP participants direct the investment of their funds into a plan administered by one of four investment providers. PEBA assumes no liability for State ORP benefits. Rather, the benefits are the liability of the investment providers. For this reason, State ORP programs are not part of the retirement systems’ trust funds for financial statement purposes. Employee and Employer contributions to the State ORP are at the same rates as SCRS. A direct remittance is required from the employers to the member’s account with investment providers for the employee contribution and a portion of the employer contribution (5 percent). A direct remittance is also required to SCRS for the remaining portion of the employer contribution and an incidental death benefit contribution, if applicable, which is retained by SCRS.

*Benefits*

Benefit terms are prescribed in Title 9 of the South Carolina Code of Laws. PEBA does not have the authority to establish or amend benefit terms without a legislative change in the code of laws. Key elements of the benefit calculation include the benefit multiplier, years of service, and average final compensation. A brief summary of the benefit terms for each system is presented below.

- SCRS - A Class Two member who has separated from service with at least five or more years of earned service is eligible for a monthly pension at age 65 or with 28 years credited service regardless of age. A member may elect early retirement with reduced pension benefits payable at age 55 with 25 years of service credit. A Class Three member who has separated from service with at least eight or more years of earned service is eligible for a monthly pension upon satisfying the Rule of 90 requirement that the total of the member’s age and the member’s creditable service equals at least 90 years. Both Class Two and Class Three members are eligible to receive a reduced deferred annuity at age 60 if they satisfy the five- or eight-year earned service requirement, respectively. An incidental death benefit is also available to beneficiaries of active and retired members of employers who participate in the death benefit program.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Plan Descriptions (continued)**

*Benefits (continued)*

The annual retirement allowance of eligible retirees or their surviving annuitants is increased by the lesser of one percent or five hundred dollars every July 1. Only those annuitants in receipt of a benefit on July 1 of the preceding year are eligible to receive the increase. Members who retire under the early retirement provisions at age 55 with 25 years of service are not eligible for the benefit adjustment until the second July 1 after reaching age 60 or the second July 1 after the date they would have had 28 years of service credit had they not retired.

*Contributions*

Contributions are prescribed in Title 9 of the South Carolina Code of Laws. Upon recommendation by the actuary in the annual actuarial valuation, the PEBA Board may adopt and present to the SFAA for approval an increase in the SCRS employer and employee contribution rates, but any such increase may not result in a differential between the employee and total employer contribution rate that exceeds 2.9 percent of earnable compensation for SCRS. An increase in the contribution rates adopted by the Board may not provide for an increase of more than one-half of one percent in any one year. If the scheduled employee and employer contributions provided in statute or the rates last adopted by the Board are insufficient to maintain a thirty-year amortization schedule of the unfunded liabilities of the plans, the Board shall increase the contribution rates in equal percentage amounts for the employer and employee as necessary to maintain the thirty-year amortization period; and, this increase is not limited to one-half of one percent per year.

After June 30, 2027, if the most recent annual actuarial valuation of the Systems for funding purposes shows a ratio of the actuarial value of system assets to the actuarial accrued liability of the system (the funded ratio) that is equal to or greater than eighty-five percent, then the board, effective on the following July first, may decrease the then current contribution rates upon making a finding that the decrease will not result in a funded ratio of less than eighty-five percent. If contribution rates are decreased pursuant to this provision, and the most recent annual actuarial valuation of the system shows a funded ratio of less than eighty-five percent, then effective on the following July first, and annually thereafter as necessary, the board shall increase the then current contribution rates until a subsequent annual actuarial valuation of the system shows a funded ratio that is equal to or greater than eighty-five percent.

The Retirement System Funding and Administration Act establishes a ceiling on employee contribution rates at 9 percent and 9.75 percent for SCRS and PORS respectively. The employer contribution rates will continue to increase annually by 1 percent through July 1, 2022. The legislation's ultimate scheduled employer rate is 18.56 percent for SCRS and 21.24 percent for PORS. The amortization period is scheduled to be reduced one year for each of the next 10 years to a twenty-year amortization period.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Plan Descriptions (continued)**

*Contributions (continued)*

Required employee contribution rates<sup>1</sup> are as follows:

	<u>Fiscal Year 2019</u>	<u>Fiscal Year 2018</u>
<b>SCRS</b>		
Employee Class Two	9.00%	9.00%
Employee Class Three	9.00%	9.00%
<b>State ORP</b>		
Employee	9.00%	9.00%

Required employer contribution rates<sup>1</sup> are as follows:

	<u>Fiscal Year 2019</u>	<u>Fiscal Year 2018</u>
<b>SCRS</b>		
Employer Class Two	14.41%	13.41%
Employer Class Three	14.41%	13.41%
Employer Incidental Death Benefit	0.15%	0.15%
<b>State ORP</b>		
Employer Contribution <sup>2</sup>	13.41%	13.41%
Employer Incidental Death Benefit	0.15%	0.15%

<sup>1</sup> Calculated on earnable compensation as defined in Title 9 of the South Carolina Code of laws.

<sup>2</sup> Of this employer contribution, 5% of earnable compensation must be remitted by the employer directly to the ORP vendor to be allocated to the member's account with the remainder of the employer contribution remitted to the SCRS.

First Steps has contributed \$351,180, \$412,089, and \$586,573 to the SCRS and ORP for the years ended June 30, 2019, 2018, and 2017, respectively.

**Actuarial Assumptions and Methods**

Actuarial valuations involve estimates of the reported amounts and assumptions about the probability of occurrence of events far into the future. Examples include assumptions about future employment, mortality, and future salary increases. Actuarial assumptions and methods used during the annual valuation process are subject to periodic revision, typically with an experience study, as actual results over an extended period of time are compared with past expectations and new estimates are made about the future. South Carolina state statute requires that an actuarial experience study be completed at least once in each five-year period. An experience report was most recently issued as of July 1, 2015.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Actuarial Assumptions and Methods (continued)**

The June 30, 2018, total pension liability (TPL), the net pension liability (NPL), and sensitivity information shown in this report were determined by the consulting actuary, Gabriel, Roeder, Smith and Company (GRS) and are based on an actuarial valuation performed as of July 1, 2017. The total pension liability was rolled-forward from the valuation date to the plans' fiscal year end, June 30, 2018, using generally accepted actuarial principles.

The following table provides a summary of the actuarial assumptions and methods used to calculate the TPL as of June 30, 2018.

	<b>SCRS</b>
Actuarial cost method	Entry age normal
Investment rate of return <sup>1</sup>	7.25%
Projected salary increases <sup>1</sup>	3.0% to 12.5% (varies by service)
Benefit adjustments	lesser of 1% or \$500 annually
<sup>1</sup> Includes inflation at 2.25%	

The post-retiree mortality assumption is dependent upon the member's job category and gender. The base mortality assumptions, the 2016 Public Retirees of South Carolina Mortality table (2016 PRSC), was developed using the Systems' mortality experience. These base rates are adjusted for future improvement in mortality using published Scale AA projected from the year 2016.

Assumptions used in the determination of the June 30, 2018, TPL are as follows.

<b>Former Job Class</b>	<b>Males</b>	<b>Females</b>
Educators	2016 PRSC Males multiplied by 92%	2016 PRSC Females multiplied by 98%
General Employees and Members of the General Assembly	2016 PRSC Males multiplied by 100%	2016 PRSC Females multiplied by 111%
Public Safety and Firefighters	2016 PRSC Males multiplied by 125%	2016 PRSC Females multiplied by 111%

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Net Pension Liability**

The net pension liability ("NPL") is calculated separately for each system and represents that particular system's total pension liability determined in accordance with GASB No. 67 less that System's fiduciary net position. The NPL amounts for SCRS are presented below:

<b>System</b>	<b>Total Pension Liability</b>	<b>Plan Fiduciary Net Position</b>	<b>Employers' Net Pension Liability</b>	<b>Plan Fiduciary Net Position as a Percentage of the Total Pension Liability</b>
SCRS	\$ 48,821,730,067	\$ 26,414,916,370	\$ 22,406,813,697	54.1%

The TPL is calculated by the Systems' actuary, and each plan's fiduciary net position is reported in the Systems' financial statements. The NPL is disclosed in accordance with the requirements of GASB 67 in the Systems' notes to the financial statements and required supplementary information. Liability calculations performed by the Systems' actuary for the purpose of satisfying the requirements of GASB Nos. 67 and 68 are not applicable for other purposes, such as determining the plans' funding requirements.

First Step's proportionate share of the net pension liability was calculated on the basis of historical employer contributions. Although GASB 68 encourages the use of the employer's projected long-term contribution effort to the retirement plan, allocating on the basis of historical employer contributions is considered acceptable. For the year ending June 30, 2018, First Step's percentage of the SCRS net pension liability was 0.05029%. For the year ending June 30, 2019, the First Step's percentage of the SCRS net pension liability was 0.03153% which is a decrease of 0.01876%. The decrease is due to a reduced head count at First Steps due to the transition of the 4K program to another provider. First Step's proportionate share is determined by its percentage of total contributions to SCRS during the respective fiscal year. The change in percentage resulted in First Step's recognizing a change in its proportionate share of the SCRS net pension liability at related deferred outflows and inflows of resources.

*Discount Rate*

The discount rate used to measure the TPL was 7.25 percent. The projection of cash flows used to determine the discount rate assumed that contributions from participating employers in SCRS and PORS will be made based on the actuarially determined rates based on provisions in the South Carolina Code of Laws. Based on those assumptions, the System's fiduciary net position was projected to be available to make all the projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the TPL.



SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Net Pension Liability (continued)**

*Long-term Expected Rate of Return*

The long-term expected rate of return on pension plan investments is based upon 30-year capital market assumptions. The long-term expected rate of returns represents assumptions developed using an arithmetic building block approach primarily based on consensus expectations and market-based inputs. Expected returns are net of investment fees.

The expected returns, along with the expected inflation rate, form the basis for the target asset allocation adopted at the beginning of the 2017 fiscal year. The long-term expected rate of return is produced by weighting the expected future real rates of return by the target allocation percentage and adding expected inflation and is summarized in the table on the following page. For actuarial purposes, the 7.25 percent assumed annual investment rate of return used in the calculation of the TPL includes a 5.00 percent real rate of return and a 2.25 percent inflation component.

<u>Asset Class</u>	<u>Target Asset Allocation</u>	<u>Expected Arithmetic Real Rate of Return</u>	<u>Long Term Expected Portfolio Real Rate of Return</u>
<b>Global Equity</b>	<b>47.0%</b>		
Global Public Equity	33.0%	6.99%	2.31%
Private Equity	9.0%	8.73%	0.79%
Equity Options Strategies	5.0%	5.52%	0.28%
<b>Real Assets</b>	<b>10.0%</b>		
Real Estate (Private)	6.0%	3.54%	0.21%
Real Estate (REITs)	2.0%	5.46%	0.11%
Infrastructure	2.0%	5.09%	0.10%
<b>Opportunistic</b>	<b>13.0%</b>		
GTAA/Risk Parity	8.0%	3.75%	0.30%
Hedge Funds (non-PA)	2.0%	3.45%	0.07%
Other Opportunistic Strategies	3.0%	3.75%	0.11%
<b>Diversified Credit</b>	<b>18.0%</b>		
Mixed Credit	6.0%	3.05%	0.18%
Emerging Markets Debt	5.0%	3.94%	0.20%
Private Debt	7.0%	3.89%	0.27%
<b>Conservative Fixed Income</b>	<b>12.0%</b>		
Core Fixed Income	10.0%	0.94%	0.09%
Cash and Short Duration (Net)	2.0%	0.34%	0.01%
Total Expected Real Return	100.0%		5.03%
Inflation for Actuarial Purposes			2.25%
Total Expected Nominal Return			7.28%

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

*Sensitivity Analysis*

The following table presents the collective net pension liability of the participating employers calculated using the discount rate of 7.25 percent, as well as what the employers' net pension liability would be if it were calculated using a discount rate that is 1.00 percent lower (6.25 percent) or 1.00 percent higher (8.25 percent) than the current rate.

<b>Sensitivity of the Proportional Share of Net Pension Liability to Changes in the Discount Rate</b>			
<b>System</b>	<b>1.00% Decrease (6.25%)</b>	<b>Current Discount Rate (7.25%)</b>	<b>1.00% Increase (8.25%)</b>
SCRS	\$ 9,026,477	\$ 7,063,997	\$ 5,661,012

**Deferred Outflows (Inflows) of Resources**

For the year ended June 30, 2019, First Steps recognized pension expense of \$620,743 which is included in employer fringe benefits in the accompanying financial statements. At June 30, 2019, the First Steps reported deferred outflows (inflows) of resources related to pensions from the following sources and will be amortized to pension expense as noted in following schedules. Average remaining service lives of all employees provided with pensions through the pension plans at June 30, 2018 was 4.080 years for SCRS:

	<u>Deferred Outflows of Resources</u>	<u>Deferred Inflows of Resources</u>
Pension contributions subsequent to measurement date	\$ 351,180	\$ —
Differences in actual and expected plan experience	12,751	41,570
Change in proportionate share and differences between First Steps' contributions and proportionate share of contributions	1,516,839	2,924,114
Changes in assumptions	280,260	—
Net differences between projected and actual earnings on plan investments	112,212	—
	<u>\$ 2,273,242</u>	<u>\$ 2,965,684</u>

<b>Measurement Period Ending June 30,</b>	<b>Fiscal Year Ending June 30,</b>	<b>SCRS</b>
2019	2020	\$ (205,869)
2020	2021	174,557
2021	2022	987,285
2022	2023	87,649

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**6. Pension Plan (continued)**

**Deferred Outflows (Inflows) of Resources (continued)**

First Steps reported \$351,180 as deferred outflows of resources related to contributions subsequent to the measurement date which will be recognized as a reduction of the net pension liability in the year ended June 30, 2020.

**7. Post-Employment Benefits Other than Pensions**

PEBA is a state agency responsible for the administration and management of the state's employee insurance programs, other post-employment benefits trusts. By law, the SFFA, which consists of five elected officials, also reviews certain PEBA Board decisions in administering the State Health Plan and other post-employment benefits (OPEB). See Note 6 for more details on PEBA and the SFAA.

PEBA, Insurance Benefits issues audited financial statements and required supplementary information for the OPEB Trust Fund. This information is publicly available through the Insurance Benefits' link on PEBA's website at [www.peba.sc.gov](http://www.peba.sc.gov) or a copy may be obtained by submitting a request to PEBA – Insurance Benefits, 202 Arbor Lake Drive, Columbia, SC 29223. PEBA is considered a division of the primary government of the state of South Carolina and therefore, OPEB Trust fund financial information is also included in the comprehensive annual financial report of the state.

*Plan Descriptions*

The Other Post-Employment Benefits Trust Fund (OPEB Trust), refers to the South Carolina Retiree Health Insurance Trust Fund (SCRHITF) established by the State of South Carolina as Act 195, which became effective on May 2008. The SCRHITF was created to fund and account for the employer costs of the State's retiree health and dental plans.

In accordance with Act 195, the OPEB Trust is administered by the PEBA, Insurance Benefits and the State Treasurer is the custodian of the funds held in trust. The Board of Directors of PEBA has been designated as the Trustee.

The OPEB Trust is a cost-sharing multiple-employer defined benefit plan. Article 5 of the State Code of Laws defines the plan and authorizes the Trustee to at any time adjust the plan, including its benefits and contributions, as necessary to insure the fiscal stability of the plan. In accordance with the South Carolina Code of Laws and the annual Appropriations Act, the State provides post-employment health and dental benefits to retired State and school district employees and their covered dependents.

*Benefits*

The SCRHITF is a healthcare plan that covers retired employees of the State of South Carolina, including all agencies, and public-school districts. The SCRHITF provides health and dental insurance benefits to eligible retirees. Generally, retirees are eligible for the health and dental benefits if they have established at least ten years of retirement service credit. For new hires beginning employment May 2, 2008 and after, retirees are eligible for benefits if they have established 25 years of service for 100% employer funding and 15-24 years of service for 50% employer funding.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**7. Post-Employment Benefits Other than Pensions (continued)**

*Contributions and Funding Policies*

Section 1-11-710 of the South Carolina Code of Laws of 1976, as amended, requires these postemployment and long-term disability benefits to be funded through annual appropriations by the General Assembly for active employees to the PEBA, Insurance Benefits and participating retirees to PEBA, except for the portion funded through the pension surcharge and provided from the other applicable sources of the PEBA, Insurance Benefits. For active employees who are not funded by State General Fund appropriations, participating employers are mandated by State statute to contribute at a rate assessed each year by the Department of Administration Executive Budget Office. The covered payroll surcharge for the year ended June 30, 2017 was 5.33 percent and for the year ended June 30, 2018 was 5.50 percent. The South Carolina Retirement System collects the monthly surcharge for all participating employers and remits it directly to the SCRHITF. Other sources of funding for the SCRHITF include mandatory transfers of accumulated PEBA, Insurance Benefits' reserves and income generated from investments. Employer contributions also include the implicit subsidy, or age-related subsidy inherent in the healthcare premiums structure. The implicit subsidy represents a portion of the health care expenditures paid on behalf of the employer's active employees. For purposes of GASB Statement No. 75, this expenditure on behalf of the active employee is reclassified as a retiree health care expenditure so that the employer's contributions towards the plan reflect the underlying age-adjusted, retiree benefit costs.

**Actuarial Assumptions and Methods**

Actuarial valuations of an ongoing plan involve estimates of the value of reported amounts and assumptions about the probability of occurrence of events far into the future. Examples include assumptions about future employment, mortality, and the healthcare cost trend. Actuarially determined amounts are subject to continual revision as actual results are compared with past expectations and new estimates are made about the future.

Projections of benefits for financial reporting purposes are based on the substantive plans (as understood by the employer and plan participants) and include the types of benefits provided at the time the valuation and the historical pattern of sharing of benefit costs between the employer and plan members to that point. The actuarial methods and assumptions used include techniques that are designed to reduce the effects of short-term volatility in actuarial accrued liabilities and the actuarial value of assets, consistent with the long-term perspective of the calculations.

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**7. Post-Employment Benefits Other than Pensions (continued)**

**Actuarial Assumptions and Methods (continued)**

Additional information as of the latest actuarial valuation for SCRHITF:

<b>Valuation Date:</b>	June 30, 2017
<b>Actuarial Cost Method:</b>	Entry Age Normal
<b>Inflation:</b>	2.25%
<b>Investment Rate of Return:</b>	4.00%, net of OPEB Plan investment expense; including inflation
<b>Single Discount Rate:</b>	3.62% as of June 30, 2018
<b>Demographic Assumptions:</b>	Based on the experience study performed for the South Carolina Retirement Systems for the 5-year period ending June 30, 2015
<b>Mortality:</b>	For healthy retirees, the 2016 Public Retirees of South Carolina Mortality Table for Males and the 2016 Public Retirees of South Carolina Mortality Table for Females are used with fully generational mortality projections based on Scale AA from the year 2016. Multipliers are applied to the base tables based on gender and employment type.
<b>Health Care Trend Rate:</b>	Initial trend starting at 6.75% and gradually decreasing to an ultimate trend rate of 4.15% over a period of 15 years
<b>Aging Factors:</b>	Based on plan specific experience
<b>Retiree Participation:</b>	79% for retirees who are eligible for funded premiums 59% participation for retirees who are eligible for Partial Funded Premiums 20% participation for retirees who are eligible for Non-Funded Premiums
<b>Notes:</b>	There were no benefit changes during the year; the discount rate changed from 3.59% as of June 30, 2017 to 3.62% as of June 30, 2018

**Roll Forward Disclosures**

The actuarial valuation were performed as of June 30, 2017. Update procedures were used to roll forward the total OPEB liability to June 30, 2018.

**Net OPEB Liability**

The Net OPEB Liability (NOL) is calculated separately for each OPEB Trust Fund and represents that particular Trust's Total OPEB Liability (TOL) determined in accordance with GASB No. 74 less that Trust's fiduciary net position. The allocation of each employer's proportionate share of the collective Net OPEB Liability and collective OPEB Expense was determined using the employer's payroll-related contributions over the measurement period. This method is expected to be reflective of the employer's long-term contribution effort.

The following table represents the components of the net OPEB liability as of June 30, 2018:

OPEB Trust	Total OPEB Liability	Plan Fiduciary Net Position	Net OPEB Liability	Plan Fiduciary Net Position as a % of Total OPEB Liability
SCRHITF	\$ 15,387,115,010	\$ 1,216,530,062	\$ 14,170,584,948	7.91%

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**7. Post-Employment Benefits Other than Pensions (continued)**

**Net OPEB Liability (continued)**

The TOL is calculated by the Trusts' actuary, and each Trust's fiduciary net position is reported in the Trust's financial statements. The NOL is disclosed in accordance with the requirements of GASB No. 74 in the Trusts' notes to the financial statements and required supplementary information. Liability calculations performed by the Trusts' actuary for the purpose of satisfying the requirements of GASB Nos. 74 and 75 and are not applicable for other purposes, such as determining the Trusts' funding requirements.

At June 30, 2019, First Steps reported a liability of \$4,812,069 for its proportionate share of the net OPEB liability. The net OPEB liability was measured as of June 30, 2018, and the total OPEB liability used to calculate the net OPEB liability was determined by an actuarial valuation as of June 30, 2017 and rolled forward to June 30, 2018. First Steps' proportion of the net OPEB liability was based on a projection of the First Steps' long-term share of contributions to the OPEB plan relative to the projected contributions of all participating entities, actuarially determined. At June 30, 2018 and 2017, First Steps' proportion was 0.033958% and 0.056381%, respectively.

*Single Discount Rate*

The Single Discount Rate of 3.62% was used to measure the total OPEB liability for the SCRHITF. The accounting policy for this plan is to set the Single Discount Rate equal to the prevailing municipal bond rate. Due to the plan's investment and funding policies, the difference between a blended discount rate and the municipal bond rate would be less than several basis points (several hundredths of one percent).

*Long-term Expected Rate of Return*

The long-term expected rate of return represents assumptions developed using an arithmetic building block approach primarily based on consensus expectations and market-based inputs. The expected returns, along with the expected inflation rate, form the basis for the target asset allocation adopted at the beginning of the 2017 fiscal year. The long-term expected rate of return is produced by weighting the expected future real rates of return by the target allocation percentage and adding expected inflation. This information is summarized in the following table:

<u>Asset Class</u>	<u>Target Asset Allocation</u>	<u>Expected Arithmetic Real Rate of Return</u>	<u>Allocation Weighted Long Term Expected Portfolio Real Rate of Return</u>
US Domestic Fixed Income	80.00%	2.09%	1.67%
Cash	20.00%	0.84%	0.17%
Total Expected Real Return	100.0%		1.84%
Expected Inflation			2.25%
Total Return			4.09%
Investment Return Assumption			4.00%

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**7. Post-Employment Benefits Other than Pensions (continued)**

**Net OPEB Liability (continued)**

*Sensitivity Analysis*

The following table represents First Steps' proportionate share of the SCRHITF's net OPEB liability calculated using a Single Discount Rate of 3.62%, as well as what the First Steps' proportionate share of the net OPEB liability would be if it were calculated using a Single Discount Rate that is one percent lower or one percent higher:

Sensitivity of the Proportional Share of Net OPEB Liability to Changes in the Single Discount Rate			
OPEB Trust	1.00% Decrease (2.62%)	Current Discount Rate (3.62%)	1.00% Increase (4.62%)
SCRHITF	\$ 5,669,080	\$ 4,812,069	\$ 4,121,251

Regarding the sensitivity of First Steps' proportionate share of SCRHITF's net OPEB liability to changes in the healthcare cost trend rates, the following table presents First Steps' proportionate share of the net OPEB liability, calculated using the assumed trend rates as well as what First Steps' proportionate share of the net OPEB liability would be if were calculated using a trend rate that is one percent lower or one percent higher:

Sensitivity of the Proportional Share of Net OPEB Liability to Changes in the Healthcare Cost Trend Rate			
OPEB Trust	1.00% Decrease	Current Healthcare Cost Trend Rate	1.00% Increase
SCRHITF	\$ 3,959,556	\$ 4,812,069	\$ 5,914,211

**OPEB Expense and Deferred Outflows and Inflows of Resources**

For the year ended June 30, 2019, First Steps recognized OPEB benefit of \$174,141. At June 30, 2019, First Steps reported deferred outflows and inflows of resources related to OPEB from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
OPEB contributions subsequent to measurement date	\$ 145,923	\$ —
Differences in actual and expected plan experience	72,087	1,677
Changes in assumptions	—	391,848
Change in proportionate share and differences between First Steps' contributions and proportionate share of contributions	—	
Net differences between projected and actual earnings on plan investments	18,451	2,858,767
	<u>\$ 236,461</u>	<u>\$ 3,252,292</u>

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**7. Post-Employment Benefits Other than Pensions (continued)**

**OPEB Expense and Deferred Outflows and Inflows of Resources (continued)**

Contributions subsequent to the measurement date of \$145,923 were reported as deferred outflows of resources related to OPEB and will be recognized as a reduction of the net OPEB liability in the year ended June 30, 2020. Other amounts reported as deferred outflows and inflows of resources related to OPEB will be recognized in OPEB expense as follows. Average remaining services lives of all employees provided with OPEB through the June 30, 2018 was 7.203 years for SCRHITF:

<b>Measurement Period Ending June 30,</b>	<b>Fiscal Year Ending June 30,</b>	<b>SCRHITF</b>
2019	2020	\$ 517,564
2020	2021	517,564
2021	2022	517,564
2022	2023	519,540
2023	2024	522,671
Thereafter		566,851

**8. Deferred Compensation Plans**

Several optional deferred compensation plans are available to State employees. The multiple-employer plans, created under Internal Revenue Code Sections 457, 401(k), and 403(b), are administered by third parties and are not included in First Steps' financial statements. Compensation deferred under the plans is placed in trust for the contributing employee. First Steps has no liability for losses under the plans. Employees may withdraw the current value of their contributions when they terminate State employment. Employees may also withdraw contributions prior to termination if they meet requirements specified by the applicable plan. First Steps made no contributions for the fiscal year ending June 30, 2019.

**9. Risk Management**

First Steps is exposed to various risks of loss including theft of, damage to, or destruction of assets, and general torts and maintains state insurance coverage for non-owned motor vehicles and general torts. First Steps did not incur any losses during the past three years.

First Steps has not transferred the risk of loss for employee theft or misappropriation of assets and the portion of the risks of loss related to insurance policy deductibles for non-owned motor vehicles and torts to a state or commercial insurer.

**10. Transactions with State Entities / Related Parties**

First Steps had significant transactions with the State and various State agencies. First Steps purchases goods and services from various State agencies. Total purchases from State agencies were approximately \$438,175 for the year ended June 30, 2019, including approximately \$6,017 in insurance premiums described below.



SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**10. Transactions with State Entities / Related Parties (continued)**

First Steps provided no material services free of charge to other State agencies during the fiscal year. First Steps participates in the statewide dual employment program. Workers' compensation and other insurance premiums for the fiscal year ended June 30, 2019 of \$6,017 were paid to the State Workers' Compensation Commission and Insurance Reserve Fund.

**11. Commitments and Contingencies**

*Leases*

First Steps has entered into a non-cancellable lease, considered an operating lease, for a facility used to house operations critical to First Steps' mission. Rent expense related to this lease was approximately \$121,000. Total lease and rental expense was approximately \$252,043, for the year ended June 30, 2019. Future base rental payments under non-cancellable leases are as follows:

Fiscal year ending June 30:

2020	148,558
2021	37,200
2022	37,200
2023	37,200
Total	<u>\$ 260,158</u>

*Grants*

First Steps receives financial assistance from various federal, state, and local governmental agencies in the form of grants. Disbursements of funds received under these programs generally require compliance with the terms and conditions specified in the grant agreements. The disbursements are also subject to audit by the grantor agencies. Any disallowed claims resulting from such audits could become a liability. However, in the opinion of management, any such disallowed claims will not have a material effect on any of the financial statements included herein or on the overall financial position of First Steps at June 30, 2019.

*County Partnership Regional Finance Managers*

During 2018, First Steps entered into a contract with a single Regional Finance Manager for its County Partnerships. The contract has a five-year term with estimated remaining payments as follows:

Fiscal year ending June 30:

2020	392,500
2021	392,500
2022	392,500
	<u>\$ 1,177,500</u>

SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED JUNE 30, 2019

**11. Commitments and Contingencies (continued)**

*Local Partnership Accounting Software Development*

During the year ended June 30, 2019, First Steps entered into an agreement for the development and implementation of a new accounting software for the local partnerships. The contract is for a five-year term and requires an initial \$125,000 expenditure for design and implementation.

**South Carolina First Steps to School Readiness  
Required Supplementary Information -  
Budgetary Comparison Schedule – Budgetary General Funds  
(Non-GAAP Budgetary Basis – Unaudited)  
For the Year Ended June 30, 2019**

	<u>Budgeted Amounts</u>			<u>Variance Positive (Negative)</u>
	<u>Original</u>	<u>Final</u>	<u>Actual</u>	
Expenditures:				
First Steps to School Readiness				
Personal Services				
Classified Positions	\$ 67,621	\$ 67,621	\$ 65,497	\$ 2,124
Special Items				
Teacher Supplies	—	60,500	60,500	—
CDEPP	6,424,200	6,424,200	6,424,200	—
Employer Contributions	<u>29,689</u>	<u>29,689</u>	<u>25,340</u>	<u>4,349</u>
Total First Steps to School Readiness	<u>\$ 6,521,510</u>	<u>\$ 6,582,010</u>	<u>\$ 6,575,537</u>	<u>\$ 6,473</u>

**South Carolina First Steps to School Readiness  
Required Supplementary Information -  
Budgetary Comparison Schedule – Other Budgeted Funds  
(Non-GAAP Budgetary Basis – Unaudited)  
For the Year Ended June 30, 2019**

	Budgeted Amounts			Variance Positive (Negative)
	Original	Final	Actual	
Expenditures:				
First Steps to School Readiness				
Personal Services				
Classified Positions	\$ 2,873,885	\$ 2,665,425	\$ 1,798,231	\$ 867,194
Unclassified Positions	121,540	130,000	127,465	2,535
Other Personal Services	425,000	625,000	515,810	109,190
Other Operating Expenses	1,906,225	1,956,710	1,711,730	244,980
Special Items				
County Partnerships	14,435,228	14,435,228	14,435,228	—
Early Head Start	3,182,392	1,004,907	755,063	249,844
CDEPP	9,767,864	10,737,864	10,466,442	271,422
Office of First Steps	1,821,000	2,923,485	205,055	2,718,430
Employer Contributions	986,235	1,040,750	897,730	143,020
Total First Steps to School Readiness	<u>\$ 35,519,369</u>	<u>\$ 35,519,369</u>	<u>\$ 30,912,754</u>	<u>\$ 4,606,615</u>

**SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO REQUIRED SUPPLEMENTARY INFORMATION -  
BUDGETARY COMPARISON SCHEDULES  
FOR THE YEAR ENDED JUNE 30, 2019**

**1. Budgetary Funds**

South Carolina's Annual Appropriation Act, the State's legally adopted budget, does not present budgets by GAAP fund. Instead, it presents program-level budgets for the following two funds:

*General Funds* – These funds are general operating funds. The resources in the funds are primarily taxes. The State expends General Funds to provide traditional State government services.

*Total Funds* – The Total Funds column in the Appropriations Act includes all budgeted resources. Amounts in this column include General Funds as well as most, but not all, federal and department-generated resources. Total funds include portions of certain proprietary and capital project fund activities as well as most special revenue activities but exclude the pension trust funds and some other fiduciary fund activities.

Amounts presented as *Other Budgeted Funds* are obtained by subtracting the General Funds column in the Appropriations Act from the Total Funds columns. Revenue is not presented in the budgetary schedule because it is budgeted at the Statewide level.

As operating conditions change, First Steps may transfer appropriations between programs and classifications within programs. However, limits are placed on increasing/decreasing authorizations for personal services without State Fiscal Accountability Authority approval. Also, a revision of budgeted amounts over and above the total revenues appropriated requires approval of the State Fiscal Accountability Authority.

Both the funds appropriated by the State and other budgeted funds are included within the General Fund for financial statement presentation under GAAP.

**2. Original and Final Budgeted Amounts; Basis of Presentation**

The original appropriations presented in the accompanying schedule for the General Funds include amounts in the Appropriations Act as well as any appropriation reductions specifically authorized by law to prevent duplicate appropriations. The terminology, classification, and format of the appropriations section of the accompanying schedules are substantively the same as for the legally adopted budget. The State allows First Steps to transfer its appropriated funds to restricted accounts to allow for the opportunity for interest to be earned on these appropriated amounts. However, expenditures have been presented in accordance with the classifications provided for in the legally adopted budget.

The State's General Assembly does not approve estimated revenue or fund balance amounts for Other Budgeted Funds which include the First Steps' General Fund. However, Section 115 (*Recapitulations*) of the Appropriation Act includes net source of funds amounts (i.e. estimated cash brought forward from the previous fiscal year plus estimated revenue for the current fiscal year minus estimated cash to be carried forward to the following fiscal year) for three categories of Other Budgeted Funds: Federal, Earmarked, and Restricted. A budget versus actual comparison for the First Steps' General Funds and Other Budgeted Funds are presented as required supplementary information.

**SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO REQUIRED SUPPLEMENTARY INFORMATION -  
BUDGETARY COMPARISON SCHEDULES  
FOR THE YEAR ENDED JUNE 30, 2019**

**3. Legal Level of Budgetary Control**

First Steps maintains budgetary control at the level of summary objective category of expenditure within each program of each department or agency which is the level of detail presented in the accompanying schedules.

**4. Basis of Budgeting**

Current legislation states that the General Assembly intends to appropriate all monies to operate State government for the current fiscal year. Unexpended appropriations lapse on July 31 unless the department or agency is given specific authorization to carry them forward to the next fiscal year. First Steps has such authorization to carry forward its funds. Cash-basis accounting for payroll expenditures is used, while the accrual basis is used for other expenditures.

State law does not precisely define the State's budgetary basis of budgeting. In practice, however, it is the cash basis with the following exceptions:

- Departments and agencies shall charge certain vendor and interfund payments against the preceding fiscal year's appropriations through July 14.
- All revenues are recorded only when the State receives the related cash with the exception of certain tax amounts, such as motor fuel taxes and gas taxes, which are not received by First Steps' General Funds.

**5. Budget to GAAP Reporting Differences**

Budgetary accounting principles differ significantly from GAAP accounting principles. Basis differences arise because the basis of budgeting differs from the GAAP basis used to prepare the statement of revenues, expenditures, and changes in fund balance. In the current year, there are funds that are received by First Steps that are not legally budgeted and therefore, the amounts reported as actual expenditures on the budgetary basis do not agree to the actual expenditures reported in the governmental fund Statement of Revenue, Expenditure, and Changes in Fund Balance and the Statement of Activities. The differences between the budgetary comparison schedules for the General Funds and Other Budgeted Funds as compared to the Statement of Revenues, Expenditures, and Changes in Fund Balance are related strictly to the modified accrual basis of accounting which include accounts receivable and accounts payable as revenues and expenditures in the current year while the budgetary basis would include those amounts in the year that payments were actually received or paid. A reconciliation of the budgetary basis expenditures to the GAAP basis expenditures is below:

**SOUTH CAROLINA FIRST STEPS TO SCHOOL READINESS  
NOTES TO REQUIRED SUPPLEMENTARY INFORMATION -  
BUDGETARY COMPARISON SCHEDULES  
FOR THE YEAR ENDED JUNE 30, 2019**

**5. Budget to GAAP Reporting Differences (continued)**

Reconciliation of Budget Basis to GAAP Basis Expenditures  
For the Year Ended June 30, 2019

	General Fund	Other Budgeted Funds	Total
Total expenditures, budgetary basis	\$ 6,575,537	\$ 30,912,754	\$ 37,488,291
Perspective differences:			
All expenditures are reported in the General Fund for GAAP	30,912,754	(30,912,754)	—
Basis of accounting differences:			
Change in accrued salaries	(75,149)	—	(75,149)
Change in accounts payable	(322,825)	—	(322,825)
Amounts grossed up for GAAP basis that represent a transfer of appropriations on the budgetary basis	105,000	—	105,000
Revenues in the special revenue fund are considered expenditures in the General Fund for budgetary purposes	(15,257,500)	—	(15,257,500)
Return of funds from local partnerships reducing GAAP expenditures is not accounted for under budgetary basis	(615,887)	—	(615,887)
Payments made after year end applied to current year budgetary basis but will apply to next year under GAAP	(170,000)	—	(170,000)
Other basis differences	66,726	—	60,726
Total expenditures, GAAP basis	\$ 21,218,656	\$ —	\$ 21,218,656

**South Carolina First Steps to School Readiness  
Required Supplementary Information -  
Schedule of the South Carolina First Steps  
to School Readiness' Proportionate Share of the Net  
Pension Liability – South Carolina Retirement System  
As of June 30, 2019  
Last Six Fiscal Years**

	2019	2018	2017	2016	2015
First Steps' proportion of the net pension liability	0.03153%	0.050291%	0.038504%	0.031435%	0.031390%
First Steps' proportionate share of the net pension liability	\$ 7,063,997	\$ 11,321,231	\$ 8,224,476	\$ 5,961,706	\$ 5,404,384
First Steps' covered payroll	\$ 3,039,003	\$ 5,074,161	\$ 3,728,634	\$ 2,947,293	\$ 2,849,840
First Steps' proportionate share of the net pension liability as percentage of covered payroll	232.44%	223.12%	220.58%	202.28%	189.64%
Plan fiduciary net position as a percentage of the total pension liability	54.1%	53.3%	52.9%	57.0%	59.9%
First Steps' proportion of the net pension liability	2014 0.031390%				
First Steps' proportionate share of the net pension liability	\$ 5,630,315				
First Steps' covered payroll	\$ 2,889,764				
First Steps' proportionate share of the net pension liability as percentage of covered payroll	194.84%				
Plan fiduciary net position as a percentage of the total pension liability	56.4%				

Note: The amounts presented above were determined as of June 30<sup>th</sup> of the preceding year.

Note: Only six years of data were available; thus, only six years were presented.



**South Carolina First Steps to School Readiness  
Required Supplementary Information -  
Schedule of the South Carolina First Steps  
to School Readiness' Contributions -  
South Carolina Retirement System  
As of June 30, 2019  
Last Nine Fiscal Years**

	2019	2018	2017	2016	2015
Contractually required contribution Contributions in relation to the contractually required contribution Contribution deficiency (excess)	\$ 351,180 351,180 \$ -	\$ 412,089 412,089 \$ -	\$ 586,573 586,573 \$ -	\$ 412,387 412,387 \$ -	\$ 321,255 321,255 \$ -
First Steps covered payroll Contributions as a percentage of covered payroll	\$ 2,411,951 14.56%	\$ 3,039,003 13.56%	\$ 5,074,161 11.56%	\$ 3,728,634 11.06%	\$ 2,947,293 10.90%
Contractually required contribution Contributions in relation to the contractually required contribution Contribution deficiency (excess)	\$ 302,083 302,083 \$ -	\$ 306,315 306,315 \$ -	\$ 219,508 219,508 \$ -	\$ 189,512 189,512 \$ -	
First Steps covered payroll Contributions as a percentage of covered payroll	\$ 2,849,840 10.60%	\$ 2,889,764 10.60%	\$ 2,302,129 9.54%	\$ 2,018,232 9.39%	

Note: Only nine years of data were available; thus, only nine years were presented.

**South Carolina First Steps to School Readiness  
Required Supplementary Information -  
Schedule of the South Carolina First Steps  
to School Readiness' Proportionate Share of the Net  
OPEB Liability – South Carolina Health Insurance Trust Fund  
As of June 30, 2019  
Last Three Fiscal Years**

	2019	2018	2017
First Steps' proportion of the net OPEB liability	0.033958%	0.056381%	0.056381%
First Steps' proportionate share of the net OPEB liability	\$ 4,812,069	\$ 7,645,667	\$ 8,157,559
First Steps' covered payroll	\$ 2,928,455	\$ 4,760,094	\$ 3,728,634
First Steps' proportionate share of the net OPEB liability as percentage of covered payroll	164.32%	160.62%	218.78%
Plan fiduciary net position as a percentage of the total OPEB liability	7.91%	7.60%	6.62%

Note: The amounts presented above were determined as of June 30<sup>th</sup> of the preceding year.

Note: Only three years of data was available; thus, only three years are presented.

**South Carolina First Steps to School Readiness  
Required Supplementary Information -  
Schedule of the South Carolina First Steps  
to School Readiness' Contributions -  
South Carolina Health Insurance Trust Fund  
As of June 30, 2019  
Last Three Fiscal Years**

	2019	2018	2017
Contractually required contribution	\$ 145,923	\$ 161,065	\$ 232,315
Contributions in relation to the			
contractually required contribution	145,923	161,065	232,315
Contribution deficiency (excess)	\$ -	\$ -	\$ -
First Steps covered payroll	\$ 2,244,969	\$ 2,928,455	\$ 4,358,630
Contributions as a percentage of			
Covered payroll	6.50%	5.50%	5.33%

Note: Only three years of data were available; thus, only three years are presented.





# Greene Finney, LLP

CERTIFIED PUBLIC ACCOUNTANTS & ADVISORS

## REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*

### INDEPENDENT AUDITOR'S REPORT

Mr. George L. Kennedy, CPA  
State Auditor  
Office of the State Auditor  
Columbia, South Carolina

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the governmental activities and each major fund of South Carolina First Steps to School Readiness ("First Steps") as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise First Steps' basic financial statements, and have issued our report thereon dated September 25, 2019.

#### Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered First Steps' internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of First Steps' internal control. Accordingly, we do not express an opinion on the effectiveness of First Steps' internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

#### Compliance and Other Matters

As part of obtaining reasonable assurance about whether First Steps' financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

---

GREENEFINNEY.COM · INFO@GREENEFINNEY.COM

MAULDIN, SC  
864.232.5204

CHARLESTON, SC  
843.735.5805

SPARTANBURG, SC  
864.232.5204

ASHEVILLE, NC  
828.771.0847  
OPEN BY APPOINTMENT ONLY

### **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

A handwritten signature in cursive script that reads "Greene Finney, LLP".

Greene Finney, LLP  
Mauldin, South Carolina  
September 25, 2019